

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

CONSOLIDATED INDUSTRIES, LLC)	
d/b/a WEATHER KING PORTABLE)	
BUILDINGS,)	
)	
Plaintiff,)	
)	No. 1:22-cv-01230-STA-jay
v.)	
)	
JESSE A. MAUPIN, <i>et al.</i>,)	
)	
Defendants.)	

PLAINTIFF’S MOTION FOR SANCTIONS

Pursuant to Fed. R. Civ. P. 37(a)(5), Plaintiff respectfully seeks an award against Defendants for Plaintiff’s reasonable expenses, including attorney’s fees, incurred in connection with pursuing its Motion to Compel Supplementation of Discovery Responses (Doc. 75). Plaintiff has filed herewith a memorandum of law in support of this motion and is submitting a proposed order granting this motion.¹

Respectfully submitted,

BUTLER SNOW LLP

/s/ David L. Johnson

David L. Johnson, BPR #18732
John H. Dollarhide, BPR #40041
150 3rd Avenue South, Suite 1600
Nashville, TN 37201
(615) 651-6700

david.johnson@butlersnow.com
john.dollarhide@butlersnow.com

Daniel W. Van Horn, BPR #18940
6075 Poplar Ave., Suite 500

¹ Upon the Court’s request, Plaintiff will be prepared to present proof of the expenses it has incurred.

Memphis, TN 38119
(901) 680-7200
Danny.VanHorn@butlersnow.com

Attorneys for Plaintiff

CERTIFICATE OF COUNSEL

In accordance with Local Rule 7.2(a)(1)(B), I, counsel for Plaintiff certify that the parties' counsel have conferred about the relief requested in this motion but were unable to reach accord. Specifically, I have conferred with Attorney Thomas Pasternak via email correspondence dated June 20, 2023.

/s/ David L. Johnson
David L. Johnson

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2023, I filed the foregoing with the Court using the ECF system, which will provide notice and a copy to counsel of record:

Thomas G. Pasternak
AKERMAN LLP
71 South Wacker Drive, 47th Floor
Chicago, IL 60606
thomas.pasternak@akerman.com
Attorneys for Defendants

/s/ David L. Johnson
David L. Johnson